

APPENDIX B

Evidence of Compliance with Outreach Requirements

2025 URBAN WATER MANAGEMENT PLAN for the City and County of San Francisco

June 2026

Prepared by: The San Francisco Public Utilities Commission



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Summary SFPUC's Compliance with the Public Notification Elements of the Urban Water Management Plan Act

Code Section	Code Requirement	Summary of Action Taken	Documentation (Attached after this Table)
Water Code Section 10620	Notify any city or county within which the supplier provides water supplies that the urban water supplier will be reviewing the plan and considering amendments or changes.	February 12, 2026: Emailed various interested parties regarding the preparation of the 2025 UWMP, including City departments, wholesale customers of the Hetch Hetchy Regional Water System, suburban retail customers (e.g., SFO), large regional water agencies (e.g., East Bay Municipal Utility District), and the Bay Area Water Supply Conservation Agency (BAWSCA) March 12, 2026: Emailed a notification of the 2025 UWMP public hearing with details on how to watch the hearing and submit public comments to the UWMP contact list April 1, 2026: Sent a reminder email to the UWMP contact list regarding the availability of the Draft 2025 UWMP and the upcoming public hearing	Copy of the 2/12/2026 email Copy of the 3/12/2026 email (also sent again on 4/1/2026) Contact list
Water Code Section 10642	Encourage the active involvement of diverse social, cultural, and economic elements of the population within the service area prior to and during the preparation of the plan.	February 12 and March 12, 2026: Sent emails to a larger distribution list of parties known by the SFPUC to be interested in water resources planning March 16, 2026: Posted the Draft 2025 UWMP on the SFPUC website at www.sfwater.gov/uwmp March 30 and April 6, 2026: Posted an advertisement in a local community newspaper in English regarding the availability of the Draft 2025 UWMP, as well as the time and location of the public hearing and the process to submit public comments	Copy of the 2/12/2026 email Copy of the 3/12/2026 email Copy of website posting Declaration of publication in the San Francisco Chronicle with a copy of the advertisement
Water Code Section 10642	Prior to the required hearing, publish the notice of time and place of hearing within the jurisdiction of the supplier pursuant to Section 6066 of the Government Code.	March 30 and April 6, 2026: Posted an advertisement in a local community newspaper that complies with Section 6066 of the Government Code	Declaration of publication in the San Francisco Chronicle with a copy of the advertisement
Water Code Section 10642	Prior to the required hearing, provide notice of time and place of hearing to any city or county within which the supplier provides water.	March 12, 2026: Emailed a notification of the 2025 UWMP public hearing with details on how to watch the hearing and submit public comments to the UWMP contact list April 1, 2026: Sent a reminder email to the UWMP contact list regarding the availability of the Draft 2025 UWMP and the upcoming public hearing	Copy of the 3/12/2026 email (also sent again on 4/1/2026) Contact list

Code Section	Code Requirement	Summary of Action Taken	Documentation (Attached after this Table)
Water Code Section 10642	Prior to adoption, make the plan available for public inspection.	March 12, 2026: Emailed a notification of the 2025 UWMP public hearing with details on how to watch the hearing and submit public comments to the UWMP contact list March 16, 2026: Posted the Draft 2025 UWMP on the SFPUC website at www.sfwater.gov/uwmp March 19, 2026: Provided two hardcopies of the Draft 2025 UWMP to the San Francisco Main Library April 1, 2026: Sent a reminder email to the UWMP contact list regarding the availability of the Draft 2025 UWMP and the upcoming public hearing	Copy of the 3/12/2026 email (also sent again on 4/1/2026) Contact list Copy of website posting
Water Code Section 10642	Prior to adoption, hold a public hearing.	April 14, 2026: Held a public hearing on the Draft 2025 UWMP during a regular meeting of the San Francisco Public Utilities Commission	Copy of the Commission Meeting Agenda on 4/14/2026 Compilation of public comments received
Water Code Section 10642	After the hearing, the plan shall be adopted as prepared or as modified after the meeting.	June 23, 2026: Adopted the 2025 UWMP (as amended) during a regular meeting of the San Francisco Public Utilities Commission	<i>To be inserted in Appendix G:</i> Signed Resolution to Adopt the 2025 UWMP
Water Code Section 10644(a)	Within 30 days of plan adoption, submit a copy to DWR.	By July 1, 2026 (exact date to be determined): Submitted the adopted 2025 UWMP electronically via the WUEdata Online Submittal Tool	<i>To be inserted:</i> Copy of DWR submittal confirmation
Water Code Section 10644(a)	Within 30 days of plan adoption, submit a copy to the California State Library.	By July 14, 2026 (exact date to be determined): Mailed a copy of the adopted 2025 UWMP on compact disc to the California State Library	<i>To be inserted:</i> Copy of delivery confirmation to the California State Library
Water Code Section 10644(a)	Within 30 days of plan adoption, submit a copy to any city or county within which the supplier provides water.	By July 14, 2026 (exact date to be determined): Emailed the adopted 2025 UWMP to all cities or counties within which the SFPUC provides water, including wholesale customers of the Regional Water System	<i>To be inserted:</i> Copy of the 7/14/26 email (exact date to be determined)
Water Code Section 10645	Within 30 days of submittal to DWR, make the plan available for public review during normal business hours.	By July 30, 2026 (exact date to be determined): Provided two hardcopies of the adopted 2025 UWMP to the San Francisco Main Library By July 30, 2026 (exact date to be determined): Posted the adopted 2025 UWMP on the SFPUC website at www.sfwater.gov/uwmp	<i>To be inserted:</i> Copy of library catalog record <i>To be inserted:</i> Copy of website posting

From: [San Francisco Public Utilities Commission](#)

To: [Urban Water Management Plan](#)

Subject: Notice of Preparation of the City and County of San Francisco's 2025 Urban Water Management Plan and Water Shortage Contingency Plan

Date: Thursday, February 12, 2026 6:35:42 PM



Dear Customers, Community Members, and Interested Parties,

The Urban Water Management Planning Act (California Water Code §10610-10657) requires urban water suppliers to update and adopt their [Urban Water Management Plan \(UWMP\)](#) and Water Shortage Contingency Plan (WSCP) every five years. The City and County of San Francisco is currently reviewing its UWMP and WSCP and will be preparing updates to these documents. The 2025 UWMP and WSCP are due to the California Department of Water Resources by July 1, 2026.

The 2025 UWMP will provide an overview of our water deliveries and uses, water supply sources, and water conservation programs. It will also include discussions on supply and demand projections over a 25-year planning horizon (from 2025 to 2050), available water supplies to meet existing and future demands under a range of water supply conditions, and our water demand management measures to reduce long-term water demand.

Proposed revisions to the UWMP and WSCP will be available for public review and comment. Information on the date and time of the public hearing, the procedure to submit comments, and where to access the Draft 2025 UWMP and WSCP will be provided in a later notification, prior to the start of the public review period. The City and County of San Francisco invites your agency to participate in this process.

In the meantime, if you have any questions about the UWMP or WSCP, please contact Jennifer Lee at uwmp@sfgwater.org.

Sincerely,

Julie Ortiz
Acting Director of Water Resources



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Got this as a forward? Sign up to receive our future emails.
[View this email online.](#)

525 Golden Gate Ave | San Francisco, CA 94102 US

From: San Francisco Public Utilities Commission
To: Urban Water Management Plan
Subject: Notice of Preparation of the City and County of San Francisco Urban Water Management Plan 2025 Update and Public Hearing
Date: Thursday, March 12, 2026 10:00:30 AM



Dear Customers, Community Members, and Interested Parties,

The Urban Water Management Planning Act (California Water Code §10610-10657) requires urban water suppliers to update and adopt their [Urban Water Management Plan \(UWMP\)](#) and Water Shortage Contingency Plan (WSCP) every five years. The City and County of San Francisco is currently preparing its 2025 UWMP and WSCP and will be updating to these documents. The 2025 UWMP and WSCP are due to the California Department of Water Resources by July 1, 2026.

The 2025 UWMP will provide an overview of our water deliveries and uses, water supply sources, and water conservation programs. It will also include discussions on supply and demand projections over a 25-year planning horizon (from 2025 to 2050), available water supplies to meet existing and future demands under a range of water supply conditions, and our water demand management measures to reduce long-term water demand.

The UWMP and WSCP will be available for public review and comment from March 16, 2026 to April 20, 2026. The Draft 2025 UWMP and WSCP will be available for download on the SFPUC website at www.sfpuc.gov/uwmp and available for physical review at the San Francisco Main Library. The City and County of San Francisco invites you or your agency to review these plans.

Notice of Public Hearing

On Tuesday, April 14, 2026, at the regular San Francisco Public Utilities Commission (Commission) meeting that begins at 1:30PM, the Commission will hold a public hearing on the Draft 2025 UWMP and WSCP in San Francisco City Hall, Room 400, 1 Dr. Carlton B. Goodlett Place, San Francisco, California, 94102.

Interested members of the public are invited to attend the public hearing and may provide public comment. The public hearing can also be accessed virtually using the following information:

Remote Public Comment Call-in: 1 (415) 655-0001 / **Access Code:** 2661 529 2962

WATCH LIVE MEETING ON APRIL 14

Submission of Comments

Any interested parties may also submit written comments to the City during the public comment period in the following ways:

1. Written comments may be emailed to uwmp@sfgwater.org.
2. Written comments may be mailed to the address below. To ensure that comments can be reviewed and incorporated, any mailed comments must be post-marked by April 16, 2026.

Steve Ritchie, San Francisco Public Utilities Commission
525 Golden Gate Avenue, 13th Floor
San Francisco, CA 94102

The final 2025 UWMP and WSCP will be adopted by the Commission no later than June 30, 2026. If you have any questions about the UWMP or WSCP, please contact Jennifer Lee at uwmp@sfgwater.org.

Sincerely,

Manisha Kothari
Acting Director of Water Resources



Manage your preferences | Opt Out using TrueRemove™
Got this as a forward? Sign up to receive our future emails.
[View this email online.](#)

525 Golden Gate Ave | San Francisco, CA 94102 US

This email was sent to uwmp@sfgwater.org.
To continue receiving our emails, add us to your address book.

Contact List for 2025 UWMP

No.	Organization	Contact
1	Mayor's Office	Daniel Lurie
2	Mayor's Office	Alicia John-Baptiste
3	Board of Supervisor, District 1	Connie Chan
4	Board of Supervisor, District 2	Stephen Sherrill
5	Board of Supervisor, District 3	Danny Sauter
6	Board of Supervisor, District 4	Alan Wong
7	Board of Supervisor, District 5	Bilal Mahmood
8	Board of Supervisor, District 6	Matt Dorsey
9	Board of Supervisor, District 7	Myrna Melgar
10	Board of Supervisor, District 8	Rafael Mandelman
11	Board of Supervisor, District 9	Jackie Fielder
12	Board of Supervisor, District 10	Shamann Walton
13	Board of Supervisor, District 11	Chyanne Chen
14	SF Environment	Barry Hooper
15	SF Environment	Lowell Chu
16	SF Environment	Sheehan Charles
17	SF Environment	Esther Tang
18	SF Environment	Pauli Ojea
19	SF Environment	Kevin Kumataka
20	SF Planning	Joshua Switzky
21	SFPUC Citizens' Advisory Committee	Amy Nagengast
22	SFPUC Citizens' Advisory Committee	Arthine Van Duyne
23	SFPUC Citizens' Advisory Committee	Barklee Sanders
24	SFPUC Citizens' Advisory Committee	Cal Law
25	SFPUC Citizens' Advisory Committee	Douglas Jacuzzi
26	SFPUC Citizens' Advisory Committee	Eliahu Perszyk
27	SFPUC Citizens' Advisory Committee	Erin Roach
28	SFPUC Citizens' Advisory Committee	Jennifer Clary
29	SFPUC Citizens' Advisory Committee	Jodi Soboll
30	SFPUC Citizens' Advisory Committee	Julia Hernandez
31	SFPUC Citizens' Advisory Committee	Maika Pinkston
32	SFPUC Citizens' Advisory Committee	Sally Chen
33	SFPUC Commission	
34	City College of San Francisco	Ted Aranas
35	SF State	Davin Wentworth-Thrasher
36	SF State - Director of Sustainability and Energy	Caitlin Steele
37	University of San Francisco	Richard Hsu
38	Environmental Defense Fund	Ann Hayden
39	Natural Resources Defense Council	Ed Osann
40	Planning and Conservation League	Jonas Minton
41	Restore Hetch Hetchy	Spreck Rosekrans
42	Save the Bay- Executive Director	David Lewis
43	Sierra Club San Francisco	Mark Shahinian
44	Sierra Club San Francisco	John Bauters

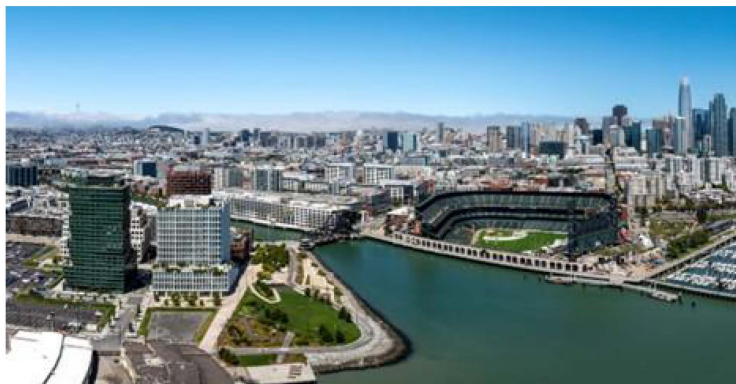
No.	Organization	Contact
45	Sierra Club San Francisco	Miguel Miguel
46	Sierra Club San Francisco	Sue Chow
47	SPUR	
48	U.S. Environmental Protection Agency	Jay Garland
49	U.S. Environmental Protection Agency, Region 9	Dena Vallano
50	U.S. Environmental Protection Agency, Region 9	Eric Byous
51	Garden for the Environment	Maggie Guerra Marks
52	Bay Area Water Stewards	
53	San Francisco Neighborhood Parks Council	Meredith Thomas
54	East Bay Municipal Utility District	
55	County of Alameda	Susan Muranishi
56	County of San Mateo	Mike Callagy
57	County of Santa Clara	James Williams
58	County of San Joaquin	Sandy Regalo
59	County of Tuolumne	Roger Root
60	Imagine H2O	Brian Matthay
61	Imagine H2O	Scott Bryan
62	Imagine H2O	Tamin Pechet
63	Pacific Institute	Heather Cooley
64	Pacific Institute	Peter Gleick
65	SF Power	Steven Moss
66	Wholly H2O	Elizabeth Dougherty
67	Yosemite Rivers Alliance	Peter Drekmeier
68	Lawrence Livermore National Laboratory	Bill Howing
69	Lawrence Livermore National Laboratory	Waqas Iqbal
70	Lawrence Livermore National Laboratory	Allen Lindauer
71	Lawrence Livermore National Laboratory	Isaac Mason
72	Lawrence Livermore National Laboratory	Glenn Shephard
73	Lawrence Livermore National Laboratory	Joe Steadman
74	Menlo Country Club	Kip Prah
75	Department of Water Resources	Ryan Bailey
76	Bay Area Water Supply and Conservation Agency	Danielle McPherson
77	Bay Area Water Supply and Conservation Agency	Tom Francis
78	Bay Area Water Supply and Conservation Agency	Tom Smegal
79	Bay Area Water Supply and Conservation Agency	Kyle Ramey
80	Bay Area Water Supply and Conservation Agency	Negin Ashoori
81	NASA	Jeanne Sabin
82	NASA	Garrett Turner
83	Alameda County Water District	Laura Hidas
84	Alameda County Water District	Jonathan Wunderlich
85	Alameda County Water District	Kelsi Oshiro
86	Alameda County Water District	Tan Zi
87	City of Burlingame/Guadalupe valley municipal improvement District	Jerry Flanagan
88	City of Burlingame/Guadalupe valley municipal improvement District	Maz Bozorginia
89	City of Burlingame/Guadalupe valley municipal improvement District	Matthew Lee
90	City of Burlingame	Kevin Okada

No.	Organization	Contact
91	California Water Service Company	Scott Wagner
92	California Water Service Company	Michael Bolzowski
93	California Water Service Company	J Kooy
94	California Water Service Company	Ross Moilan
95	California Water Service Company	Dawn Smithson
96	California Water Service Company	William Torsch
97	California Water Service Company	Kevin Williams
98	Coastside County Water District	Cathleen Brennan
99	Coastside County Water District	Mary Rogren
100	Coastside County Water District	Jeffrey Schneider
101	City of Daly City	Joshua Cosgrove
102	City of Daly City	Greg Krauss
103	City of East Palo Alto	Matt Vining
104	City of East Palo Alto	Humza Javed
105	City of East Palo Alto	Anthony Harper
106	City of East Palo Alto	Kevin Lewis
107	City of Foster City	Zaheed Danish
108	City of Foster City	Yelena Cappello
109	City of Hayward	Alex Ameri
110	City of Hayward	Cheryl Munoz
111	City of Hayward	Management Analysts
112	Town of Hillsborough	Paul Willis
113	Town of Hillsborough	Ed Cooney
114	City of Menlo Park	Scott Jaw
115	City of Menlo Park	Azalea Mitch
116	City of Menlo Park	Michael Fu
117	Mid-Peninsula Water District	Drew Bost
118	Mid-Peninsula Water District	Sarah Scheidt
119	Mid-Peninsula Water District	Kat Wuelfing
120	City of Millbrae	Craig Centis
121	City of Millbrae	Andrea Pappajohn
122	City of Millbrae	Heather Ruiz
123	City of Millbrae	Elaine Marshall
124	City of Mountain View	Lisa Au
125	City of Mountain View	Elizabeth Flegel
126	City of Mountain View	Kerry Holeman
127	North Coast County Water District	Adrienne Carr
128	North Coast County Water District	Brian McCarthy
129	City of Palo Alto	Lisa Bilir
130	City of Palo Alto	Adriana Artola
131	City of Palo Alto	Lisa Bilir
132	City of Palo Alto	Eric Wong
133	Purissima Hills Water District	Cory Burkett
134	Purissima Hills Water District	Pat Gillin
135	Purissima Hills Water District	Jose Olivera
136	Purissima Hills Water District	Tammy Rudock

No.	Organization	Contact
137	Purissima Hills Water District	Samantha Vu
138	Purissima Hills Water District	Erik Walter
139	City of Redwood City	Justin Chapel
140	City of Redwood City	Nathan Anderson
141	City of San Bruno	Dennis Bosch
142	City of San Bruno	Steven Salazar
143	City of San Bruno	Matt Lee
144	City of San Bruno	Hae Won Ritchie
145	City of San Bruno	Scott Zayac
146	City of San Jose	Nicole Harvie
147	City of San Jose	Jeff Provenzano
148	City of San Jose	Sukhpreet Manning
149	City of Santa Clara	John Ramirez
150	City of Santa Clara	Lawrence Tam
151	Stanford University	Julia Nussbaum
152	Stanford University	Brian Manning
153	City of Sunnyvale	Joe De la Cruz
154	City of Sunnyvale	Winola Cheong
155	City of Sunnyvale	Ramana Chinnakotla
156	City of Sunnyvale	Manuel Hernandez
157	Westborough Water District	Patricia Mairena
158	Cordilleras Water District	Rick Thall
159	Groveland Community Services District	Peter Kampa
160	Groveland Community Services District	Alfonso Manrique

Urban Water Management Plan

The Urban Water Management Planning Act (California Water Code Sections 10610-10657) requires urban water suppliers to update their Urban Water Management Plan (UWMP) and Water Shortage Contingency Plan (WSCP) every five years. The City and County of San Francisco adopted its 2020 UWMP, including the 2020 Water Shortage Contingency Plan, on June 11, 2021, and is currently preparing updates to these documents. The 2025 UWMP and WSCP are due to the California Department of Water Resources by July 1, 2026.



The 2025 UWMP will provide an overview of our water deliveries and uses, water supply sources, and water conservation programs. It will also include discussions on supply and demand projections over a 25-year planning horizon (from 2025 to 2050), available water supplies to meet existing and future demands under a range of water supply conditions, and our water demand management measures to reduce long-term water demand.

The public comment period for the Draft 2025 UWMP and WSCP ended on Monday, April 20, 2026. Members of the public may continue to review the draft plans using the link below or by visiting the San Francisco Main Library for a physical copy.

On Tuesday, April 14, 2026, the San Francisco Public Utilities Commission (Commission) held a public hearing on the Draft 2025 UWMP and WSCP. A recording of the public hearing can be viewed online.

Submission of Comments

The public comment period has ended. Staff are reviewing all public comments and will prepare a final draft of the 2025 UWMP and WSCP. These plans will be brought to the Commission no later than June 30, 2026 for consideration of adoption. If you have any questions about the UWMP or WSCP, please contact Jennifer Lee at uwmp@sfgov.org (<mailto:uwmp@sfgov.org>).

Other Documents

- [2025 Conservation Plan](#) 

Previous versions of the Urban Water Management Plan are available by contacting uwmp@sfgov.org (<mailto:uwmp@sfgov.org>).

DECLARATION OF PUBLICATION OF



San Francisco Chronicle | **SFGATE**

Lori Gomez

Newspaper Representative

Declares that:

The annexed, or attached, advertisement has been regularly published in the

San Francisco Chronicle

Which is and was at all times herein mentioned
established as newspaper of general circulation in the
City and County of San Francisco, State of California, as
the term is defined by Section 6000 of the Government Code.

San Francisco Chronicle
901 Mission Street
San Francisco, CA 94103

As published in the issue(s) of

3/30/2026
4/6/2026

I declare under penalty of perjury that the foregoing is
true and correct.

Executed on 4/6/2026

At San Francisco, Ca ifornia

Lori Gomez

Signature



San Francisco Water Power Sewer

Services of the San Francisco Public Utilities Commission

NOTICE OF PUBLIC HEARING Tuesday, April 14, 2026 - 1:30 PM, to be held in City Hall, Room 400, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102 at a Regular Meeting of the San Francisco Public Utilities Commission (SFPUC), the governing board of the publicly owned utility operations of the City and County of San Francisco. Notice is hereby given that the SFPUC will conduct a public hearing to consider the Draft 2025 Urban Water Management Plan (UWMP) for the City and County of San Francisco. The detailed agenda and related files will be available at least 72 hours before the scheduled meeting at the SFPUC website: www.sfpuc.gov or by calling (415) 554-3165. The public hearing can also be accessed virtually using the following information:
Watch the meeting live: www.sfgovtv.org/sfpuc
Call-in number: 1 (415) 655-0001 / Access Code: 2661 529 2962

Interested members of the public are invited to attend the public hearing and may provide public comments. Any interested parties may also submit written comments to the SFPUC until April 20, 2026 in the following ways:

- 1) Emailed to: uwmp@sfgwater.org.
- 2) Mailed to the following address: Steven R. Ritchie, SFPUC, 525 Golden Gate Avenue, 13th Floor, SF, CA 94102. To ensure that comments can be reviewed and incorporated, any mailed comments must be post-marked by April 16, 2026.

The Draft 2025 UWMP is available on the SFPUC website at: www.sfpuc.gov/uwmp. A physical copy of the document is also available for review at the SF Main Library, Government Information Center, 5th Floor, 100 Larkin St. SF, CA 94102.

Campaign: 11111259

AFFIDAVIT DELIVERY INFORMATION

Affidavit Delivery Contact:	Lori Gomez
Affidavit Delivery Address:	



SAN FRANCISCO PUBLIC UTILITIES COMMISSION
City and County of San Francisco

Daniel Lurie
Mayor

REGULAR MEETING AGENDA
Tuesday, April 14, 2026
1:30 PM

1 Dr. Carlton B. Goodlett Place, City Hall, Room 400

Members of the San Francisco Public Utilities Commission (SFPUC) will attend this meeting in-person. Members of the public are invited to observe the meeting in-person or remotely by watching live online as described below. Members of the public attending the meeting in person or remotely will have an opportunity to provide public comment on every action or discussion item.

Members of the public are encouraged to provide public comment by email. Send an email to Commission@sfgwater.org by 4 pm the day before the meeting to ensure your comment is received by the Commission in advance of the meeting. All comments received will be made part of the official record.

REMOTE MEETING ACCESS

Watch: sfgovtv.org/sfpuc

REMOTE PUBLIC COMMENT CALL-IN: 1 (415) 655-0001 / ACCESS CODE 2661 529 2962
(No Passcode Required)

*When your item of interest is called press *3 to be added to the speaker line.
Commenters will be allowed two minutes to speak. Call from a quiet location, speak clearly and slowly, and turn down your television, radio, or computer.*

Commissioners

Joshua Arce, President
Stephen E. Leveroni, Vice President
Avni Jamdar
Kate H. Stacy
Meghan Thurlow

Dennis J. Herrera
General Manager

Tiffany Lennear
Director of Commission Affairs

Accessible Meeting Policy: City Hall, Room 400 is wheelchair accessible. The meeting will be broadcast and captioned on SFGovTV. Remote public participation is available for individuals who cannot attend in person due to disability by making a request to the Director of Commission Affairs by 12 PM (noon), the day before the Commission meeting at Commission@sfgwater.org or 415-554-3165. Sign Language Interpretation is available upon request. If requesting Sign Language Interpretation, please submit an accommodation request, a minimum of four business hours before the start of the meeting. Allowing a minimum of 48 business hours for all other accommodation requests (for example, all other auxiliary aids and services) helps ensure availability. To request accommodation, please contact the Director of Commission Affairs at Commission@sfgwater.org or 415-554-3165.

Know Your Rights Under the Sunshine Ordinance: Government's duty is to serve the public, reaching its decision in full view of the public. Commissions, boards, councils and other agencies of the City and County exist to conduct the people's business. This ordinance assures that deliberations are conducted before the people and that City operations are open to the people's review. For more information on your rights under the Sunshine Ordinance or to report a violation of the ordinance, contact Administrator, by mail to Sunshine Ordinance Task Force, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA 94102.4689; by phone at 554.7724; by fax at 554.7854; or by email at sotf@sfgov.org. Copies of the Sunshine Ordinance can be obtained from the Clerk of the Sunshine Task Force, the San Francisco Public Library and on the City's website at <http://www.sfgov.org>.



311 Free Language Assistance: 免費語言協助/ Ayuda gratuita con el idioma / Бесплатная помощь переводчиков / Trợ giúp Thông dịch Miễn phí / Assistance linguistique gratuite / 無料の言語支援/ 무료 언어 / 지원 / ความช่วยเหลือทางภาษาโดยไม่คิดค่าใช้จ่าย / Libreng tulong para sa wikang Tagalog ยะเหลอ

Lobbyist Registration and Reporting Requirements: Individuals and entities that influence or attempt to influence local legislative or administrative action may be required by the San Francisco Lobbyist Ordinance [SF Campaign & Governmental Conduct Code §2.100] to register and report lobbying activity. For more information about the Lobbyist Ordinance, please contact the San Francisco Ethics Commission at 25 Van Ness Avenue, Suite 220, San Francisco, CA 94102; telephone (415) 252-3100; fax (415) 252-3112; web site at www.sfgov.org/ethics.

CEQA Appeal Rights under Chapter 31 of the San Francisco Administrative Code: If the Commission's action on a project constitutes the Approval Action for that project (as defined in S.F. Administrative Code Chapter 31, as amended, Board of Supervisors Ordinance Number 161-13), then the CEQA determination prepared in support of that Approval Action is thereafter subject to appeal within the time frame specified in S.F. Administrative Code Section 31.16. Typically, an appeal must be filed within 30 calendar days of the Approval Action for a project that has received an exemption or negative declaration pursuant to CEQA. For information on filing an appeal under Chapter 31, contact the Clerk of the Board of Supervisors at City Hall, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA 94102, or call (415) 554-5184. If the Planning Department's Environmental Review Officer has deemed a project to be exempt from further environmental review, an exemption determination has been prepared and can be obtained on-line at <http://www.sf-planning.org/index.aspx?page=3447>. Under CEQA, in a later court challenge, a litigant may be limited to raising only those issues previously raised at a hearing on the project or in written correspondence delivered to the Board of Supervisors, Planning Commission, Planning Department or San Francisco Public Utilities Commission at, or prior to, such hearing, or as part of the appeal hearing process on the CEQA decision.

ORDER OF BUSINESS

1. Call to Order

2. Roll Call

3. [Approval of the Minutes of March 24, 2026](#)

4. General Public Comment

Members of the public may address the Commission on matters that are within the Commission's jurisdiction and are not on today's agenda. The Commission values civic engagement and encourages respectful communication at the public meeting. We ask that all public comment be made in a civil and courteous manner and that you refrain from the use of profanity. Thank you.

5. Report of the General Manager (discussion only)

a) Report on Recent San Francisco Public Utilities Commission Activities, Events and Announcements

6. CONSENT CALENDAR

a) **Approve** Amendment No. 1 to [Contract No. PRO.0229](#), Emergency Planning, Response, Training and Technical Support, with AECOM Technical Services, Inc., increasing the contract duration by five years, for a total contract duration of nine years, with no change to the contract amount, for project continuity of several emergency planning projects in the Plan Update Schedule that require consultant support. (Flynn)

b) **Approve** the novation of [Contract No. PUC-0002.C](#), Master As-Needed Security System Maintenance and Integration Services, to transfer the existing contract from Ojo Technology Inc., to Convergent Technologies LLC. (Flynn)

c) **Award** [Contract No. CS-1272](#), Point-of-Sale Electric Vehicle Incentive Program to Cohen Ventures, Inc. DBA Energy Solutions in the amount of \$4,200,000 and with a duration of four years, seven months. (Hale)

d) **Approve** the novation of [Contract No. PRO.0239](#) New City Distribution Division Campus at 2000 Marin Construction Management Staff Augmentation Services, to transfer the existing contract from Consor PMCM, Inc., to Consor North America, Inc. (Robinson)

e) **Approve** Modification No. 1 to Job Order [Contract No. JOC-110](#), General Engineering (A License) Construction, San Joaquin, Stanislaus, and Tuolumne Counties, Hetch Hetchy, with Robert E. Boyer Construction, Inc., to increase the contract not-to-exceed amount by \$2,500,000, for a revised not-to-exceed contract amount of \$7,500,000, with no change to the contract duration, to

provide additional capacity for facility and asset improvements. (Robinson)

- f) **Modify** [Contract No. WW-752R](#), Various Locations Main Sewer Inspection No. 2, with Pipe and Plant Solutions, Inc., to decrease the contract amount by \$585,098, for a revised total contract amount of \$2,958,556, to adjust contract quantities to match actual completed quantities, with no change to the contract duration. (Robinson)

REGULAR CALENDAR

7. [Public hearing to consider and possible action to **adopt** new Rules and Regulations Restricting Potable Water Use for Irrigation of Nonfunctional Turf to align with Assembly Bill 1572](#); and **authorize** the General Manager in consultation with the City Attorney, to approve any non-substantive edits or minor corrections to the Rules and Regulations Restricting Potable Water Use for Irrigation of Nonfunctional Turf that are necessary or appropriate to facilitate implementation of Assembly Bill 1572. Pursuant to San Francisco Charter Section 4.104(a)(1), a Notice of Public Hearing was posted at the San Francisco Main Library and on the SFPUC's website. (Ritchie)
8. **Presentation and discussion only** of the [Draft 2025 Urban Water Management Plan, including the Draft 2025 Water Shortage Contingency Plan](#), prepared by the San Francisco Public Utilities Commission for the City and County of San Francisco pursuant to California Water Code Sections 10610-10657. The Commission will hold a second meeting to consider adoption of the final 2025 Urban Water Management Plan, following the public review and comment period on the Draft 2025 Urban Water Management Plan, no later than June 30, 2026. (Ritchie)
9. **Approve** the [Water Supply Assessment for the proposed 536 Mission Street Project \(located at 536 Mission Street\)](#), pursuant to California Water Code Section 10910 et seq., California Environmental Quality Act (CEQA) Section 21151.9, and CEQA Guidelines Section 15155. (Ritchie)
10. **Approve** the [Revised Water Supply Assessment for the proposed FlowerMart Project \(located at 610-640 & 644-658 & 660-670 & 674-698 Brannan Street, 548-5th Street, and 149 Morris Street\)](#), pursuant to California Water Code Section 10910 et seq., California Environmental Quality Act (CEQA) Section 21151.9, and CEQA Guidelines Section 15155. (Ritchie)
11. **Authorize** [the issuance of bonds or other forms of indebtedness to refund outstanding 2015 Power Revenue Bonds Series A with 2026 Power Bonds Series A \(2026A Power Refunding Bonds\) issued in a principal amount up to \\$30 million.](#) (Hom)
12. **Approve** [Amendment No. 1 to Contract No. PRO.0163\(R\)](#), Engineering Services for the Emergency Firefighting Water System and City's Water Distribution System, with

Lee+Ro and AGS Joint Venture, increasing the contract amount by \$5,000,000, for a total not-to-exceed contract amount of \$13,000,000, with no change to the contract duration, to provide additional engineering design and support for pipeline improvement projects, subject to Board of Supervisors approval under Charter Section 9.118. (Robinson)

13. COMMUNICATIONS (information only)

- a. [Advance Calendar](#)
- b. [Contract Advertisement Report](#)
- c. [Correspondence Log](#)
- d. [Water Supply Conditions Update](#)
- e. [Retail Water Conservation Plan Quinquennial \(2025\) Report](#)
- f. [Annual Municipal Energy Benchmarking Report](#)

14. Items initiated by Commissioners (discussion only)

15. Public Comment on matters to be addressed during Closed Session

16. Motion on whether to assert the attorney-client privilege regarding the matters listed below:

The Commission will go into Closed Session to discuss the following item:

CLOSED SESSION

CONFERENCE WITH LEGAL COUNSEL regarding anticipated litigation (Government Code §54956.9, Administrative Code §67.10(d)):

Craig Banks v. City and County of San Francisco

Unlitigated Claim File No.: 240239

Date Filed: September 27, 2020

Proposed settlement of employment dispute in the amount of \$100,000, subject to final approval by the San Francisco Board of Supervisors. (Action Item) (Bregman)

Following Closed Session, the Commission will reconvene in Open Session

17. Report following Closed Session

18. Motion regarding whether to disclose the discussion during Closed Session pursuant to San Francisco Administrative Code Section 67.12(a).

19. Adjournment

1 Public Comments and Responses on the Draft 2025 Urban Water Management Plan

This section details written and oral comments received on the Draft 2025 Urban Water Management Plan (UWMP), including the Draft 2025 Water Shortage Contingency Plan (WSCP), and the SFPUC's responses to these comments. The public comment period began on March 16, 2026, and ended on April 20, 2026. SFPUC staff presented the Draft 2025 UWMP to the SFPUC Citizens' Advisory Committee (CAC) on March 17, 2026, and to the SFPUC Commission at a Public Hearing on April 14, 2026.

Table 1-1 provides a list of all agencies, organizations, and individuals who submitted comments on the Draft 2025 UWMP.

Table 1-1. Comments Received on the Draft 2025 Urban Water Management Plan

Comment ID	Commenter	Date	Comment Method	Page No.
A	Denise Louie	3/17/2026	CAC Meeting	8
B	Peter Drekmeier, Yosemite Rivers Alliance	3/17/2026	CAC Meeting	8
C	Mark Shahinian, Sierra Club San Francisco Bay	3/17/2026	CAC Meeting	8
D	Arthine Cossey van Duyne, CAC Member	3/18/2026	Email	8
E	Barklee Sanders, CAC Member	4/1/2026	Email	12
F	Dave Warner	4/6/2026	Email	14
G	Peter Drekmeier, Yosemite Rivers Alliance	4/6/2026	Email	14
H	Shannon McEntee	4/7/2026	Email	16
I	Mark Shahinian, Sierra Club San Francisco Bay	4/7/2026	Email	16
J	Tom Smegal, CEO/General Manager, BAWSCA	4/14/2026	Public Hearing	17
K	Eileen Boken, Coalition for San Francisco Neighborhoods	4/14/2026	Public Hearing	17
L	Layne Fajeau, Sierra Club California	4/14/2026	Public Hearing	17
M	Mary Butterwick	4/14/2026	Public Hearing	18
N	George Cattlemore	4/14/2026	Public Hearing	18
O	Christina Berteau, Greywater Action	4/14/2026	Public Hearing	18
P	Mark Shahinian, Sierra Club San Francisco Bay	4/14/2026	Public Hearing	18
Q	Francisco Da Costa	4/14/2026	Public Hearing	19
R	Douglas Jacuzzi, Westside Water Resources	4/14/2026	Public Hearing	19
S	Tootas Cook	4/14/2026	Public Hearing	19
T	Alex Ferris	4/14/2026	Public Hearing	19
U	Hilary Hug	4/14/2026	Public Hearing	19
V	David Schram	4/14/2026	Public Hearing	20
W	Anne Schneider	4/14/2026	Public Hearing	20

Comment ID	Commenter	Date	Comment Method	Page No.
X	Martin Gothberg	4/14/2026	Public Hearing	20
Y	Les Kishler	4/14/2026	Public Hearing	20
Z	Denise Louie	4/14/2026	Public Hearing	20
AA	Peter Drekmeier, Yosemite Rivers Alliance	4/14/2026	Public Hearing	21
AB	Julie Ann Frizzell	4/14/2026	Public Hearing	21
AC	Lila Holzman	4/19/2026	Email	21
AD	Peter Drekmeier, Yosemite Rivers Alliance	4/20/2026	Email	21
AE	John J. Bauters, Sierra Club San Francisco Bay Chapter; Sue Chow, Sierra Club Loma Prieta Chapter; Miguel Miguel, Sierra Club California	2/19/2026 (before public comment period)	Email	24

Several comments raised the same or similar concerns. Rather than responding individually to recurring comments, the SFPUC developed global responses to address each recurring comment comprehensively. Global responses are provided for the following topics:

1. Water affordability
2. Retail population and demand projections
3. Wholesale demand projections
4. Design drought
5. Bay-Delta Plan Amendment

1.1 Global Response 1: Water Affordability

Summarized Comments: Several commenters raised concerns about water affordability, including: (1) the absence of a formal affordability analysis in the UWMP, (2) demand projections that may be overstated and drive unnecessary capital spending, which in turn could raise rates, and (3) perceptions that current rate-setting and capital planning processes do not fully incorporate affordability considerations.

Response:

- 1) The SFPUC is dedicated to delivering affordable water services to all customers. The scope and content of the UWMP, however, are governed by the UWMP Act (California Water Code Section 10610-10656), which establishes specific requirements for what must be included in the plan. The California Water Code does not require urban water suppliers to conduct or include a water affordability analysis. The UWMP Act focuses on ensuring that suppliers provide long-term water supply reliability assessments (Section 8 of the 2025 UWMP); demand projections including for lower-income housing (Section 4.1.5 of the 2025 UWMP); water shortage contingency planning (Appendix F of the 2025 UWMP); and descriptions of water supply sources, conservation measures, and reliability (Sections 6, 7, and 10 of the 2025 UWMP).
- 2) The SFPUC developed the demand projections in the UWMP Scenario in accordance with the requirements of the UWMP Act. State law directs urban water suppliers to base long-term population and demand projections on data from local and regional planning authorities, including adopted housing and land use projections. The SFPUC developed two additional demand scenarios showing a range of future demands; see Global Response 2. The UWMP is not a rate-setting document and does not determine water, sewer, or power rates.
- 3) The preparation of the Capital Budget, the 10-Year Financial Plan, and rates are complex processes that balance multiple needs of the SFPUC and its ratepayers. Central to these processes is affordability for the SFPUC's ratepayers. In 2023, the SFPUC adopted a more stringent affordability policy to demonstrate the SFPUC's dedication to delivering cost-based, equitable, accessible, and affordable utility services for all customers. That commitment was made clear when staff cut \$1 billion from the proposed capital budget in the most recent budgeting process. While the UWMP describes major supply and reliability projects, the decision to fund and implement those projects, including how they affect future rates, is made through the capital budgeting, 10-Year Financial Plan, and rate-setting processes, not through the UWMP update cycle.

While the UWMP is not a rate-setting document, the SFPUC remains committed to maintaining affordability as a core agency value, evaluating affordability impacts through the 10-Year Financial Plan, and implementing customer assistance programs.

1.2 Global Response 2: Retail Population and Demand Projections

Summarized Comments: Several commenters claim that the retail population projections in the 2025 UWMP are overstated, which in turn leads to inflated retail water demand projections. Commenters suggest that SFPUC's high demand projections are used to justify capital projects, which increases long-term financial obligations, and ultimately raises rates for customers. Commenters urge the use of more realistic growth projections, such as those prepared by the California Department of Finance or used by the SFPUC Finance Bureau.

Response: Per the UWMP Act (California Water Code, Section 10631(a)):

The projected population estimates shall be based upon data from the state, regional, or local service agency population projections within the service area of the urban water supplier and shall be in five-year increments to 20 years or as far as data is available. The description shall include the current and projected land uses within the existing or anticipated service area affecting the supplier's water management planning. Urban water suppliers shall coordinate with local or regional land use authorities to determine the most appropriate land use information, including, where appropriate, land use information obtained from local or regional land use authorities.

In compliance with this requirement, the SFPUC coordinated with the San Francisco Planning Department, which is the City's land use authority, and received housing and employment projections (see Section 4.1.2.1 of the 2025 UWMP). The SFPUC uses these projections as the basis for the demand projections under the UWMP Scenario to comply with state law.

As recommended in the 2024 Alternative Water Supply (AWS) Plan, the SFPUC developed two additional retail demand scenarios reflecting less housing and employment growth: a Department of Finance/Moody's Scenario that projects demand declining from 62.5 million gallons per day (MGD) in 2025 to 59.7 MGD by 2050 and a Historical Growth Scenario that projects demand increasing from 62.5 MGD in 2025 to 66.7 MGD by 2050. These scenarios provide a broader range for informational purposes and are described in Appendix C of the 2025 UWMP. The demand scenarios will be used to inform the AWS Plan Update, which is expected to begin in FY 2026-27.

The UWMP is intended to ensure there is enough water for existing and planned development. Demand projections developed for the UWMP Scenario are conservative to demonstrate reliable supply, while demand forecasts developed for financial projections are conservative by estimating low potential growth to ensure sufficient revenues. SFPUC Finance has developed separate water projections that are the basis of setting rates and does not use the UWMP demand projections when setting rates.

1.3 Global Response 3: Wholesale Demand Projections

Summarized Comments: The SFPUC received comments that it does not independently evaluate wholesale customer purchase projections, that those projections influence capital planning and rate decisions, and that the UWMP should analyze how water shortages affect vulnerable communities in the wholesale service area.

Response: The SFPUC is responsible for projecting retail water demands. Wholesale customers, including Bay Area Water Supply and Conservation Agency (BAWSCA) member agencies and the Groveland Community Services District, are responsible for preparing demand projections for their service areas and submitting purchase projections to the SFPUC for inclusion in the UWMP (see Section 4.2 of the 2025 UWMP). This approach is consistent with state law and previous UWMPs. The SFPUC does not have land use authority in the jurisdictions of its wholesale customers. It cannot substitute its own assumptions about the wholesale customers' demands or purchase projections for those developed by the wholesale customers. The wholesale customers are responsible for determining which sources of supply to use and/or develop within their respective service areas and in some cases may not purchase water exclusively from the SFPUC.

Wholesale purchase projections in the UWMP do not determine the SFPUC's wholesale rates or capital spending. Wholesale rates are established through a separate financial planning process that evaluates water sales, updated capital needs, and current financial conditions, consistent with the SFPUC's water supply agreement with the wholesale customers. Furthermore, each of the wholesale customers sets rates for its own retail customers, and those rates must comply with Proposition 218. The SFPUC is not involved in setting retail rates in its wholesale service area.

Regarding the effects of water shortages on vulnerable communities in the wholesale service area, all urban water suppliers must prepare a Water Shortage Contingency Plan, implemented in the event of a water shortage and independent from long-term supply and demand projections. The SFPUC's water supply agreement with its wholesale customers incorporates a Water Shortage Allocation Plan that governs how Regional Water System supplies are allocated between the wholesale customers collectively, on the one hand, and the retail customers collectively, on the other, during system-wide shortages (see Section 3 of the 2025 Water Shortage Contingency Plan). However, wholesale customers are responsible for contingency planning for their respective service areas including their vulnerable communities. The SFPUC does not dictate how a wholesale customer determines its sources of supply or how to allocate them.

1.4 Global Response 4: Design Drought

Summarized Comments: Multiple commenters questioned the SFPUC's 8.5-year design drought, arguing that it is longer than the scenarios used by peer agencies such as Valley Water and East Bay Municipal Utility District, is statistically unlikely to occur, and leads to more conservative rationing projections. Commenters also mention that the design drought drives unnecessary capital investment and should be shortened or replaced with a scenario more consistent with those used by other agencies.

Response: The design drought is an important water supply planning tool used by the SFPUC. The 8.5-year design drought combines two historically significant droughts (the 1987-1992 drought and the 1976-1977 drought) to create a planning drought that is longer and more severe than those observed in the historical record; this methodology allows the SFPUC to plan to operate the RWS and provide reliable water supply through extended droughts. The global climate is changing, and California weather may become more variable as a result. Preparing for this type of scenario helps the SFPUC safeguard the water supply needs of the 2.7 million residents and thousands of businesses that rely on this water supply.

As described in the UWMP, the SFPUC relies primarily on the Tuolumne River watershed for water supply in all years, including droughts. During droughts, the available water supply on the Tuolumne River can be almost entirely allocated to senior water right holders, leaving very little for the RWS. As a result, the RWS depends on water supply that is stored prior to a drought; the storage in RWS reservoirs at the start of a drought is the main source of water supply that the SFPUC manages during a drought. Beyond its own reservoirs, the SFPUC does not have other sources of water supply that it can use or otherwise rely upon as a substitute for RWS supplies during an extended drought. The SFPUC's reliance on stored water and lack of other sources are the drivers for using the design drought as part of the SFPUC's water supply planning methodology; with no backup supply to rely on, the SFPUC emphasizes maintaining reliable water supply in storage.

The SFPUC remains committed to adaptive management practices that enable responsiveness to changing conditions and will continue to revisit its planning tools periodically. The SFPUC will not modify its design drought as part of this UWMP process.

1.5 Global Response 5: Bay-Delta Plan Amendment

Summarized Comments: Several commenters raised concerns about the Bay-Delta Plan Amendment, including its effects on Tuolumne River ecosystem health and salmon recovery, the SFPUC's concerns regarding the plan, and whether a Healthy Rivers and Landscapes agreement (formerly referred to as a Voluntary Agreement) would be adequately protective of the environment. Commenters also argued that more realistic demand projections would demonstrate that the SFPUC can accommodate both the Bay-Delta Plan Amendment's requirements and its customers' water needs without undue rationing.

Response: The 2025 UWMP and its future updates will continue to reflect the latest status of the Bay-Delta Plan Amendment, including the Healthy Rivers and Landscapes Program (see Section 7.3 and Section 8 of the 2025 UWMP). However, the UWMP is intended to inform the SFPUC and public about potential future water-supply scenarios; the UWMP process does not dictate the outcome of pending litigation or related state administrative proceedings. As explained in Global Response 2, the retail demand projections in the UWMP Scenario ensure that there is enough water to meet the needs of existing and planned development, but the SFPUC also prepared two additional demand scenarios that evaluate future demand assuming less housing and employment growth. Collectively, this broader range of retail demands will be considered in the SFPUC's ongoing water supply planning.

1.6 Comments and Responses

The comments below summarize public input received at the March 17, 2026 SFPUC CAC meeting, the April 14, 2026 SFPUC Commission meeting, and through email submissions.

1.6.1 Comment A: Denise Louie

Comment A-1: The commenter asks whether affordability is a required component of the UWMP.

Response A-1: See Global Response 1 (Water Affordability).

1.6.2 Comment B: Peter Drekmeier, Yosemite Rivers Alliance

Comment B-1: The commenter argues that the SFPUC has enough storage for six years of water. In an average year, the SFPUC receives entitlements equal to three years of demand. The commenter states other water agencies like Valley Water and East Bay Municipal Utility District plan for a six-year drought of record whereas the SFPUC plans for the 1987-1992 drought with the 1976-1977 drought. The commenter states that current demand could be managed under the six-year drought of record with the Bay-Delta Plan in place with no more than 15% rationing, and that the SFPUC presents an overly severe scenario described as 72% more severe and 19 times less likely to happen than peer agency scenarios.

Response B-1: Comment noted. See Global Response 4.

1.6.3 Comment C: Mark Shahinian, Sierra Club San Francisco Bay Chapter Water Committee

Comment C-1: The commenter states that the Bay-Delta Plan is one of the top priorities for the Sierra Club because of its importance to the Tuolumne River ecosystem. The commenter links the 12% rate increase and the SFPUC's support of a Healthy Rivers and Landscapes agreement to the agency's response to the Bay-Delta Plan. The commenter states that in 2024, ratepayers in San Francisco conserved 40% more than they did in 2000, while the UWMP projects only a 7% additional per capita reduction going forward in the next 25 years. The commenter notes that the Sierra Club has come up with a different model and urged members of the CAC to review it.

Response C-1: Comment noted. See Global Response 5.

1.6.4 Comment D: Arthine Cossey van Duyne, SFPUC Citizens Advisory Committee Member

Comment D-1: The commenter identifies three strengths to preserve in the final UWMP: San Francisco's low residential water use of about 43 gallons per person per day; Section 4.1.5's acknowledgement of water demands of lower-income households; and investments in local supply diversity, including the Westside Enhanced Water Recycling Project, the Treasure Island Water Resource Recovery Facility, and expanded groundwater production.

The commenter further notes that Treasure Island is identified as an environmental justice community in the City's EJ Framework.

Response D-1: Comment noted.

Comment D-2: The commenter states that the UWMP evaluates system performance only at an aggregate level and does not assess who bears the greatest burden during shortages, where investments are geographically concentrated, or which populations face affordability stress. The commenter argues that while the UWMP Act does not explicitly require an environmental justice chapter, reliability, resilience, and demand management requirements should include a distributional analysis.

Response D-2: Comment noted.

Comment D-3: The commenter states that the plan does not map how infrastructure investment, conservation program delivery, or water reliability metrics vary across neighborhoods, making it difficult to assess whether public benefits are shared across all communities. The commenter recommends a GIS-based analysis that overlays the City's EJ Communities Map with infrastructure investment locations, recycled water service areas, conservation program delivery, pipe age and condition data, and system reliability metrics to demonstrate whether planned capital investments are aligned with the highest-need communities.

Response D-3: Comment noted. The SFPUC water conservation program evaluates its effectiveness in reaching communities with limited financial resources or language barriers to help ensure information about its water-saving assistance programs reach people in neighborhoods with lower median incomes and higher concentrations of non-English speaking residents. Although the commenter's recommendation is outside the scope of the UWMP, it has been shared with appropriate SFPUC staff for further consideration.

Comment D-4: The commenter states that under the Bay-Delta Plan Amendment implementation, retail customers could face shortages of up to 29 percent and wholesale customers could face shortages of up to 49 percent. The commenter states that neither the UWMP nor the WSCP analyzes how shortage allocations and conservation mandates will fall across income levels or neighborhoods. The commenter recommends within the WSCP, to model household-level and neighborhood-level impacts of shortage scenarios, including ability to comply with conservation mandates, exposure to rate increases, and risk of service disruption. The commenter suggests that the SFPUC increase protections against service disconnections for lower-income customers during declared shortage events and that the SFPUC provide public reporting on shortage burden by neighborhood.

Response D-4: The SFPUC [adopted a written policy](#) on discontinuation of residential water service for nonpayment per the California Water Shutoff Protection Act (California Health & Safety Code Section 116900 et seq. Under this policy, the SFPUC provides customer support for deferred or reduced payments, alternative payment schedules, bill contests and appeals, and discussion of options to avoid discontinuation of residential service for nonpayment. The SFPUC also provides the

Extenuating Circumstances for Water Shut-Off Lien Prevention Program for customers who make less than 80% of area median income. The SFPUC would continue programs to assist low-income customers during water shortages.

Comment D-5: The commenter states that Section 4.1.5 acknowledges lower-income households but does not estimate how many customers spend an unaffordable share of their income on water service. The commenter recommends estimating the number of retail customers spending 2 to 4.5 percent or more of household income on water bills, disaggregated by neighborhood and by tenure (renters vs. owners); assessing whether the tiered rate structure is functioning equitably for low-volume water users; evaluating whether bill assistance programs are reaching renters and non-account holders; and describing a plan to close any access gap identified.

Response D-5: Comment noted. See Global Response 1 (Water Affordability).

Comment D-6: The commenter states that the plan describes public participation activities but does not document which languages materials were provided in, whether meetings were held in the neighborhoods most affected, or which community organizations were engaged and what information was shared. The commenter recommends documenting which languages public materials were provided in, and the organizations engaged. The commenter also requests that the SFPUC confirm whether in-person meetings were held in Bayview Hunters Point, Chinatown, the Tenderloin, and the Mission. For the next UWMP cycle, the commenter recommends establishing a standing EJ community advisory group with documented feedback processes.

Response D-6: Public noticing for the preparation of and public hearing for the 2025 UWMP was provided and documented in Appendix B of the 2025 UWMP. While public engagement for the 2025 UWMP meets the Water Code requirements as described in Section 11.1 of the 2025 UWMP, and on March 17, 2026, the SFPUC presented the Draft 2025 UWMP to the Citizens' Advisory Committee, whose members represent each of the supervisory districts in San Francisco, the SFPUC did not conduct UWMP-specific meetings directly with any individual neighborhoods or community organizations. The SFPUC continually and proactively engages with historically underserved communities regarding rates, capital projects, customer assistance programs, and other community benefits programs. The UWMP and WSCP will continue to be updated to reflect the latest programs and services pertinent to the scope of both plans.

Comment D-7: The commenter states approximately 85 percent of San Francisco's water supply originates from the Tuolumne River watershed, the homeland of Indigenous peoples including speakers of Sierra Miwok languages, and that Hetch Hetchy Valley was inhabited and actively managed by Miwok and Paiute peoples for thousands of years before the O'Shaughnessy Dam was completed in 1923. The commenter states that the 2025 UWMP contains no acknowledgment of this history and no description of engagement with tribal nations. The commenter recommends adding a land and water acknowledgment, documenting engagement efforts with tribal nations, establishing a tribal liaison function within the SFPUC, and exploring funding commitments to support water access for tribal communities served by or adjacent to the Regional Water System.

Response D-7: The SFPUC recognizes the longstanding presence and stewardship of Native communities in these areas. For the UWMP, the SFPUC has elected not to include a land or water acknowledgement. However, the SFPUC values the importance of strengthening relationships with Tribal Nations and incorporating Indigenous perspectives, including traditional ecological knowledge and facilitating meaningful tribal collaboration.

Comment D-8: The commenter recommends replacing the plan's reliance on CalEnviroScreen 4.0 for the local cumulative impact analysis with a locally calibrated cumulative impact analysis that combines CalEnviroScreen 4.0 scores as a baseline, SFDPH Air Pollution Exposure Zone and Areas of Vulnerability data, housing crowding and linguistic isolation data from the Census, rent burden and housing instability indicators, and SFPUC service complaint, leak history, and pipe age data disaggregated by neighborhood. The commenter also recommends using the resulting composite index to guide investment prioritization and drought protection commitments for high-burden communities and committing to using the City's supplemental EJ Communities Map as the primary geographic screening tool for planning purposes, not CalEnviroScreen alone.

Response D-8: Comment noted. Although the recommendation is outside the scope of the UWMP, it has been shared with appropriate SFPUC staff for further consideration.

Comment D-9: The commenter states that the plan does not evaluate stormwater capture as a local supply strategy in EJ communities. The commenter recommends evaluating targeted stormwater capture projects in EJ communities as part of the supply diversification strategy and assessing co-benefits for water quality and neighborhood health in areas currently affected by sewer overflows.

Response D-9: Comment noted. Although the recommendation is outside the scope of the UWMP, it has been shared with appropriate SFPUC staff for further consideration. Stormwater management is coordinated by the SFPUC's Urban Watershed Planning Division. The SFPUC encourages property owners to capture and reuse stormwater onsite for non-potable uses, such as irrigation and toilet flushing, and provides resources and technical assistance to do so through various programs including the Stormwater Management and Onsite Water Reuse programs.

Comment D-10: The commenter states that the SFPUC's Community Benefits Policy recognizes the need to create green jobs in communities that have historically borne a disproportionate share of pollution burdens. The commenter recommends defining local and targeted hiring goals for capital projects in EJ communities, including the recycled water buildout and groundwater expansion; tracking and reporting workforce equity outcomes as part of UWMP implementation; and aligning capital program workforce commitments with the SFPUC's existing Community Benefits Policy.

Response D-10: While Section 7 of the 2025 UWMP describes anticipated capital investments over the planning horizon, local hiring goals, workforce equity metrics, and job creation strategies are outside the scope of the UWMP. These activities are guided by the SFPUC's Community Benefits Policy, project-specific contracting requirements, and other agency workforce and procurement programs.

Comment D-11: The commenter states that the plan projects wholesale customer shortages of up to 49 percent under modeled Bay-Delta Plan Amendment scenarios. The commenter states neither the UWMP nor the Water Shortage Allocation Plan (WSAP) analyzes whether it produces equitable outcomes for the communities that wholesale customers serve. The commenter recommends assessing whether the WSAP allocation formula, as currently structured, produces disproportionate shortage impacts on wholesale customers whose service areas include a high concentration of lower-income residents and communities of color. Where disproportionate impacts are identified, the commenter recommends consideration of whether adjustments to the allocation formula or supplemental technical assistance can reduce that disparity; encourage wholesale customers to conduct their own distributional shortage analysis and offer SFPUC technical assistance to support that work; and include wholesale system equity outcomes in the SFPUC's annual EJ performance reporting.

Response D-11: See Global Response 3 (Wholesale Demand Projections).

Comment D-12: The commenter recommends annual EJ performance reporting that covers investment alignment, affordability outcomes, shortage burden by neighborhood, and wholesale system equity outcomes; integration of spatial EJ analysis and the local cumulative impact index into the Capital Improvement Program prioritization process; alignment of rate-setting processes with affordability findings from the UWMP; and a public-facing EJ dashboard that tracks plan implementation against equity commitments.

Response D-12: Comment noted. Although the recommendation is outside the scope of the UWMP, it has been shared with appropriate SFPUC staff for further consideration.

Comment D-13: The commenter notes that the SFPUC established national leadership by adopting an environmental justice policy before any other utility in the country. The commenter states that the 2025 UWMP is an opportunity to demonstrate that this commitment shapes real planning decisions, not only policy statements. The commenter states these recommendations are grounded in the SFPUC's policies, the City's EJ Framework, the requirements and intent of the California Urban Water Management Planning Act, and best practices from the Pacific Institute, DigDeep, the U.S. Water Alliance, and EPA guidance.

Response D-13: Comment noted.

1.6.5 Comment E: Barklee Sanders, SFPUC Citizens Advisory Committee Member

Comment E-1: The commenter urges the adoption of the UWMP and WSCP with stronger accountability, clearer triggers, and enforceable implementation commitments. The commenter states that the plan should function as an operating manual for reliability, drought response, public communication, enforcement, financial consequences, and continuous reevaluation. The commenter requests a plain-English, front-of-document accountability table that shows, for each scenario, projected demand, available supply by source, shortage amount, trigger level, response actions, expected water savings or added yield, responsible department, legal authority, and

implementation deadline. The commenter also cites DWR's 2025 UWMP Guidebook to describe water use and supply assumptions, account for climate change in long-term reliability and drought risk analyses, quantify water loss, and coordinate with affected agencies and communities.

Response E-1: The 2025 UWMP includes water use and supply assumptions (Sections 4, 6, and 8), climate change considerations (Sections 4.3, 6.1.3, and 6.2.4), quantified water loss reporting (Table 4-4), and coordination with surrounding agencies and communities (Section 2.3) consistent with DWR guidance. Additionally, the WSCP does function as a drought response plan, with actions that the SFPUC would take in the event of a water shortage emergency (including, but not limited to, communications, temporary restrictions, and enforcement).

Comment E-2: The commenter requests that the Commission convert local supply diversification from "planning" to "procurement-grade execution." The commenter states that the SFPUC should attach milestone schedules for PureWaterSF, recycled water expansion, onsite reuse buildout, and other alternative supplies, with target online dates, expected annual yields, permitting path, and financing assumptions.

Response E-2: Local supply and reuse projects such as recycled water, onsite water reuse, and groundwater are described in Section 6 of the 2025 UWMP. Two additional reuse projects, PureWaterSF and PureWater Peninsula, are still in the planning phase and will be covered in subsequent UWMP updates once environmental review is completed and funding is secured. In the meantime, the SFPUC updates, at least every two years, its 10-Year Capital Plan, which contains the most current project information in between UWMP update cycles.

Comment E-3: The commenter requests that conservation be targeted where the remaining savings are still real, measurable, and fair. Specifically, the commenter states that the SFPUC should focus on leaks, commercial and institutional retrofits, large landscapes, and enforcement against waste.

Response E-3: The [2025 Retail Water Conservation Plan](#) identifies future opportunities for conservation savings in Section 3 and in Table 6-2, which notes the conservation measures the SFPUC already is implementing or plans to start implementing within the next five years.

Comment E-4: The commenter requests that the WSCP make equity and due process explicit. The commenter writes that the final WSCP should clearly state: the essential indoor health-and-sanitation baseline that will be protected; exemption and appeal procedures; protections for tenants and master-metered multifamily residents; multilingual outreach; transparent reporting of warnings, penalties, and exemptions by customer class; and the standards for escalating from voluntary to mandatory measures.

Response E-4: The activation of any shortage level is based on supply availability and the level of demands at the time a water shortage emergency declaration is being considered (Section 4.6 of the 2025 WSCP). Prior to initiating any water delivery reductions to its retail customers, the SFPUC will present a water shortage response plan at a regularly scheduled Commission meeting where members of the public will have the opportunity to comment (Section 2.5 of the 2025 WSCP). This water shortage response plan will be prepared specific to the water shortage event at hand and will

more explicitly address some of the items requested by the commenter, including a minimum per-capita residential allocation, or water use “floor,” to ensure enough water is available for basic health and safety needs (Section 4.1.3 of the 2025 WSCP). As part of the water shortage response plan, the SFPUC will notify customers of procedures for exemptions and appeals (Section 4.1.5 of the 2025 WSCP). All retail customer communications (Section 5 of the 2025 WSCP) will be provided in multiple languages per the SFPUC’s practice for customer communications. The SFPUC will comply with any required water shortage-related reporting including those described in Section 9 of the 2025 WSCP and disclosure of customers fined for exceeding water use allocations in accordance with Chapter 3.3 to Division 1 of the California Water Code.

Comment E-5: The commenter requests regional accountability, specifically an annual public dashboard and hearing after each annual water shortage assessment showing actual supply conditions, the shortage level determination, triggered response actions, actual versus projected conservation savings, water loss performance, local supply project status, and wholesale-retail coordination outcomes.

Response E-5: SFPUC staff have and will continue to coordinate with BAWSCA staff on the retail and wholesale demand projections. In addition, SFPUC staff routinely provide supply condition updates to the Commission at its regularly scheduled meetings. The meeting agendas and a copy of these presentations are available at www.sfpuc.gov. In the event of a water shortage emergency, the SFPUC would follow the procedures outlined in the Water Shortage Contingency Plan (WSCP). Figure 2-1 of the WSCP illustrates what this process may look like in a drought, and Table 3-1 of the WSCP shows the retail and wholesale customers’ respective shares of the available RWS supplies depending on the required level of system-wide reduction in water use.

1.6.6 Comment F: Dave Warner

Comment F-1: The commenter states that the SFPUC’s design drought model produces rationing estimates of 40% in the UWMP for the scenario with the Bay Delta Plan Amendment in effect. The commenter states that available scientific data exists suggesting that the design drought could have a chance of occurrence in the range of 0.013% to 0.001% (a return period between 8,000 and 70,000 years). The commenter expresses that a modest reduction to the drought model would substantially lower the listed rationing percentages. Additionally, the commenter states that current demand projections are lower than before and annual Regional Water System demand hasn’t been over 200 mgd for the last 11 years. The commenter asks SFPUC staff to quantify the risk (return period) of the design drought and lesser potential variants, and if warranted by the Long Term Vulnerability Assessment, to develop a more reasonable drought model.

Response F-1: Comment noted. See Global Response 4 (Design Drought).

1.6.7 Comment G: Peter Drekmeier, Yosemite Rivers Alliance

Comment G-1: The commenter states that during the last UWMP process, conservation groups made efforts to encourage the SFPUC to revisit the Design Drought prior to finalizing the UWMP. The

commenter notes that the Commission has yet to consider amendments to the Design Drought. The commenter asks the SFPUC to hold a workshop on the Design Drought.

Response G-1: Comment noted. See Global Response 4 (Design Drought).

Comment G-2: The commenter states affordability risks are increasing because of overestimating demand and water sales, growing capital needs, and rationing projections. The commenter asks if the SFPUC's estimated \$10 billion in additional capital costs over the next 30 years been factored into future rates, and how higher rates may impact demand. Additionally, the commenter asks how an ensuing decrease in sales may affect further rate increases.

Response G-2: See Global Response 1 (Water Affordability).

Comment G-3: The commenter states that the SFPUC's projected water supply shortages could lead to unnecessary rationing. The commenter cites a 7.4% wholesale water price increase and argues the SFPUC has a highly reliable water supply with sufficient storage and exceptional water rights in Wet, Normal and Below Normal years. The commenter expressed concern about language provided by the SFPUC for inclusion in the BAWSCA member agencies' Urban Water Management Plans – specifically, Table 4e focusing on water supply availability during a five dry-year sequence.

Response G-3: The California Water Code Section 10631(b)(1) requires:

A detailed discussion of anticipated supply availability under a normal water year, single dry year, and droughts lasting at least five years, as well as more frequent and severe periods of drought, as described in the drought risk assessment. For each source of water supply, consider any information pertinent to the reliability analysis conducted pursuant to Section 10635, including changes in supply due to climate change.

In compliance with the Water Code requirements, the SFPUC prepared a supply reliability analysis and letter for Wholesale Customers to use in their respective 2025 UWMPs.

Comment G-4: The commenter states that Table 8-3 from the Draft 2025 UWMP finds the SFPUC would only be able to provide 57% of baseline water demand in Years 2 through 5 of a five-year drought sequence if the Bay-Delta Plan Amendment is implemented but does not show how much water is left in storage at the end of each year. The commenter states under the SFPUC's design drought scenario, at the end of the first five consecutive dry years, the SFPUC would still have more than 600 thousand acre-feet of water remaining in storage – enough water to last at least 2.5 years. The commenter asserts, in reference to the driest historic five-year sequence, the SFPUC could manage the five consecutive dry years with the Bay-Delta Plan Amendment in effect and still have water remaining in storage. The commenter cites the LTVA, which suggests there is “no clear direction of change in mean annual precipitation over the planning horizon.” The commenter also recommends revising the length and severity of the Design Drought.

Response G-4: Comment noted. See Global Response 4 (Design Drought).

1.6.8 Comment H: Shannon McEntee

Comment H-1: The commenter states that the UWMP uses inflated population growth projections, projecting San Francisco to grow from 843,881 in 2025 to 1,231,654 in 2050, an addition of 387,773 people in 25 years, or 15,511 people per year. The commenter compares this with 2005 to 2025 growth of 62,044, or 3,102 people per year, and asks whether San Francisco’s population will grow five times as fast than in the recent past. The commenter requests that the SFPUC reconsider its population estimates in the final UWMP.

Response H-1: See Global Response 2 (Retail Population and Demand Projections).

1.6.9 Comment I: Mark Shahinian, Sierra Club San Francisco Bay Chapter Water Committee

Comment I-1: The commenter states that the 2025 UWMP overpredicts projected customer demand. The commenter asserts that adopting this plan would result in a variety of financial and environmental impacts. The commenter states the models that underlie the demand projections lack sufficient support. The commenter states SFPUC and BAWSCA models assume the following: residences are 100% occupied; loss projections that exceed those allowable by state law; no increases in rates; and that all active conservation programs end in 2035. The commenter asks the SFPUC to revise its modeling assumptions in response to the commenter’s feedback, set up a working group to re-evaluate and issue a revised UWMP, and alter its approach towards the Bay Delta Plan Amendment.

Response I-1: As described in Global Response 2, the SFPUC coordinated with the San Francisco Planning Department to receive housing growth projections through 2050. The assumption that single family and multi-family residences will be 100% occupied starting in FY 2029-30 is consistent with the UWMP’s approach of ensuring enough water supply for the anticipated growth as projected by the SF Planning Department. This is described in Appendix C (2025 Retail Demand Model and Projections Technical Memorandum). Regarding water loss projections, see Section 4.1.4 of the 2025 UWMP that discusses the SFPUC’s approach for estimating future water losses. Urban water supplies have until 2028 to meet new water-loss standards. Regarding rates, the demand model incorporates water, wastewater, and stormwater rate increases from the 10-Year Financial Plan (February 2025) approved by the San Francisco Public Utilities Commission. Lastly, the SFPUC does not assume that all active conservation programs end in 2035. As shown in Table 7-2 of the 2025 Retail Water Conservation Plan, active conservation program savings extend past 2035 and through 2050. Beyond 2035, the SFPUC cannot precisely predict participation rates, new measures yet to be implemented, or what the water savings would be for future measures. Therefore, the projected savings peak in 2035 and water conservation savings in subsequent years are lower but do not end in 2035. The SFPUC has committed to updating its Retail Water Conservation Plan and conservation savings model and to reviewing implemented and potential new conservation measures every five years, coinciding with the SFPUC’s update of the UWMP.

1.6.10 Comment J: Tom Smegal, Bay Area Water Supply and Conservation Agency

Comment J-1: The commenter noted that BAWSCA worked on a set of core common assumptions that all of BAWSCA's member agencies agreed to as a basis for the BAWSCA demand study for the wholesale service area. The commenter stated that the results of the BAWSCA demand study were reviewed by all of BAWSCA's member agencies and were used to develop the wholesale customer purchase requests data that BAWSCA provided to the SFPUC for its UWMP. The commenter stated that BAWSCA supports the adoption of the SFPUC 2025 UWMP based on its review and coordination efforts with the SFPUC. The commenter noted BAWSCA's understanding that the UWMP is in compliance with the UWMP Act and that failing to adopt the UWMP within the State's deadline may make SFPUC ineligible for State loans and grants. The commenter stated that BAWSCA has an interest in the SFPUC's financial standing and its ability to remain eligible for grant funding.

Response J-1: Comment noted.

1.6.11 Comment K: Eileen Boken, Coalition for San Francisco Neighborhoods

Comment K-1: The commenter suggests the current draft of the SFPUC's 2025 UWMP is based on outdated population projections from the Department of Finance. The commenter asserts that the State Department of Finance now projects population to remain flat for the foreseeable future. According to the commenter, the population projections in the UWMP lead to inflated demand projections and design-drought projections, resulting in increased rates to pay for unnecessary capital improvements. The commenter states most water agencies plan for a 6-year drought, and the SFPUC's 8.5-year design drought also seems beyond the norm. The commenter asserts that an 8.5-year drought deprives the Tuolumne River of the flows it needs for ecosystem health.

Response K-1: One of the two additional retail demand scenarios developed by the SFPUC, the Department of Finance/Moody's Scenario, reflects a flat population projection from the California Department of Finance. Development of this scenario is described in Appendix C of the 2025 UWMP. Please also see Global Response 2 (Retail Population and Demand Projections) and Global Response 4 (Design Drought).

1.6.12 Comment L: Layne Fajeau, Sierra Club California

Comment L-1: The commenter states that the SFPUC has overestimated water demands, which leads to increased capital spending and rapidly rising rates. In addition, the commenter states the SFPUC's water demand projections affect the SFPUC's perception of the impacts of the Bay-Delta Plan Amendment. The commenter urges the SFPUC to address errors in the demand modeling identified by the Sierra Club prior to the finalizing the 2025 UWMP, and to adopt more realistic demand projections that don't lead to overbuilding, rising costs, and environmental harm.

Response L-1: Please see Response I-1 regarding the demand modeling concerns identified by the Sierra Club, Global Response 1 (Water Affordability), and Global Response 2 (Retail Population and Demand Projections).

1.6.13 Comment M: Mary Butterwick

Comment M-1: The commenter states that the UWMP, particularly the 8.5-year design drought, directly affects the management of flows of the Tuolumne River, which is in crisis due to inadequate instream flows. The commenter requests that the SFPUC revise the length of its design drought before submitting the UWMP to DWR. Specifically, the commenter states that the SFPUC should re-evaluate the return period for the design drought and conduct a risk analysis of the design drought compared with shorter drought models. The commenter cites an analysis conducted by the Yosemite Rivers Alliance that showed significant volumes of water stored at the end of each year of the design drought without rationing.

Response M-1: See Global Response 1 (Water Affordability) and Global Response 4 (Design Drought).

1.6.14 Comment N: George Cattlemore

Comment N-1: The commenter expresses concern about the health of the local ecosystem due to over-pumping by farmers. The commenter suggests the SFPUC has overestimated water demands. The commenter requests the SFPUC consider the Tuolumne watershed. The commenter also asserts that the SFPUC has underestimated the cost of water. The commenter asserts that, in addition to raising rates, the SFPUC is now planning \$10 billion in capital improvements, and that there should be an audit of the Commission focusing on internal and external costs of the decisions and how these decisions are made.

Response N-1: See Global Response 2 (Retail Population and Demand Projections).

1.6.15 Comment O: Christina Berteau, Greywater Action

Comment O-1: The commenter asserts that UWMPs have historically over-projected demands, claims that the SFPUC's design drought is statistically likely to occur once in 8,000 years, and requests that the SFPUC modify the design drought by using a six-year drought of record that other agencies use, so that the Bay-Delta Plan Amendment flow requirements can be implemented. The commenter expresses various environmental concerns.

Response O-1: See Global Response 4 (Design Drought).

1.6.16 Comment P: Mark Shahinian, Sierra Club San Francisco Bay

Comment P-1: The commenter states that they performed the analysis presented in the letters sent by the Sierra Club regarding the 2025 UWMP. The commenter asserts that the SFPUC's current demand projections are problematic. The commenter suggests that the UWMP informs the SFPUC's understanding of the impacts that may be caused by the Bay-Delta Plan Amendment.

Response P-1: See Global Response 2 (Retail Population and Demand Projections) and Global Response 5 (Bay-Delta Plan Amendment). Responses I-1 and AE-1 through AE-6 respond to the referenced letter sent by the Sierra Club.

1.6.17 Comment Q: Francisco Da Costa

Comment Q-1: The commenter references the former beauty of the Hetch Hetchy Valley and the need to respect the indigenous people in and near the Tuolumne River watershed.

Response Q-1: Comment noted.

1.6.18 Comment R: Doug Jacuzzi, Westside Water Resources

Comment R-1: The commenter states that the SFPUC needs to consider the salmon and the Delta's ecosystem health and requests that the SFPUC adjust the design drought to a more appropriate drought scenario.

Response R-1: Comment noted. See Global Response 4 (Design Drought).

1.6.19 Comment S: Tootas Cook

Comment S-1: The commenter also asserts that UWMPs have always over-projected water demands and the 2025 UWMP does it as well. The commenter also asserts that SFPUC has plenty of water for the Bay-Delta Plan Amendment and requests that the SFPUC alter its demand projections and the severity of the design drought. The commenter also supports the request for an independent audit of the Commission and its projections.

Response S-1: Comments noted. See Global Response 2 (Retail Population and Demand Projections) and Global Response 5 (Bay-Delta Plan Amendment).

1.6.20 Comment T: Alex Ferris

Comment T-1: The commenter states that the Bay Delta ecosystem is in collapse. The commenter claims that the SFPUC's proposed Healthy Rivers and Landscapes Agreement would harm fish, which are an important element of the ecosystem and should be protected.

Response T-1: See Global Response 5 (Bay-Delta Plan Amendment).

1.6.21 Comment U: Hilary Hug

Comment U-1: The commenter states they rely on the SFPUC to maintain the ecological integrity of the Tuolumne River watershed, the San Joaquin River, and the Bay Delta. The commenter requests the SFPUC change its position regarding the Bay-Delta Plan Amendment. The commenter also requests a workshop where critics and proponents of the draft UWMP can provide information essential for a science-based policy.

Response U-1: See Global Response 5 (Bay-Delta Plan Amendment).

1.6.22 Comment V: David Schram

Comment V-1: The commenter expresses concern about ensuring high-quality and affordable water and about protecting the natural environment. The commenter asserts that the UWMP is based on overly high demand projections, which have been consistently decreasing.

Response V-1: See Global Response 2 (Retail Population and Demand Projections).

1.6.23 Comment W: Anne Schneider

Comment W-1: The commenter suggests that with the design drought, the UWMP plans for an event that would never happen, which affects SFPUC's capital improvement plan and rates. The commenter asserts that in Millbrae, this will cause an increase of 10 to 14% in water rates, which will reduce the amount of water residents use, and reduce the amount of money that Millbrae has to invest in recycled water and other alternative water supplies.

Response W-1: Comment noted. See Global Response 4 (Design Drought).

1.6.24 Comment X: Martin Gothberg

Comment X-1: The commenter asserts that there is a need for revised demand projections and a shorter design drought to improve ecosystem health and to discharge less water in wet years. The commenter asserts that SFPUC's design drought drives expenses and servicing of debt, which drives rates higher than people can afford. The commenter also states that Bay Area residents can do even more to conserve water.

Response X-1: Comments noted. See Global Response 1 (Water Affordability), Global Response 2 (Retail Population and Demand Projections). and Global Response 4 (Design Drought).

1.6.25 Comment Y: Les Kishler

Comment Y-1: The commenter expresses concern about the health and wellbeing of the San Francisco Bay and Delta. The commenter asserts over-estimating water needs has unintended consequences that are unnecessary and preventable and that the SFPUC should allow more water to reach the Bay-Delta.

Response Y-1: See Global Response 2 (Retail Population and Demand Projections) and Global Response 5 (Bay-Delta Plan Amendment).

1.6.26 Comment Z: Denise Louie

Comment Z-1: The commenter asserts that the UWMP is used to justify an expensive water supply system, which does not include the \$10 billion of capital improvements or the expansion to the

emergency firefighting system. The commenter requests the SFPUC revisit its concerns regarding the Bay-Delta Plan Amendment.

Response Z-1: See Global Response 1 (Water Affordability) and Global Response 5 (Bay-Delta Plan Amendment).

1.6.27 Comment AA: Peter Drekmeier, Yosemite Rivers Alliance

Comment AA-1: The commenter states that the UWMP is used as a planning document and the Alternative Water Supply Plan is based on the UWMP. The commenter claims that there are two flaws with the UWMP: overly high demand projections and the design drought. The commenter asserts that there is an inadequate assumption of how costs impact demands and that the design drought is too conservative and unlikely to happen. The commenter requests a workshop before finalizing the UWMP.

Response AA-1: Comments noted. See Global Response 2 (Retail Population and Demand Projections) and Global Response 4 (Design Drought).

1.6.28 Comment AB: Julie Ann Frizzell

Comment AB-1: The commenter expresses concern about the environment and residential water bill rates. The commenter claims that the UWMP contains outdated information and that the SFPUC continues to project water demands incorrectly despite people in the Bay Area conserving water. The commenter also asserts that no other water agencies in the State use an 8-year design drought, that the population data the SFPUC uses is too high and leads to costly projects and that the SFPUC raises water rates for BAWSCA members in order to pay for these projects.

Response AB-1: See Global Response 1 (Water Affordability), Global Response 2 (Retail Population and Demand Projections), and Global Response 4 (Design Drought).

1.6.29 Comment AC: Lila Holzman, SFPUC Citizens' Advisory Committee Member

Comment AC-1: The commenter states that they recently joined the Citizens' Advisory Committee and heard a presentation about the Draft 2025 UWMP on March 17. During that meeting, the commenter also heard concerns about overestimating demand. The commenter requests that the SFPUC ensure its modeling does not unnecessarily result in unneeded investments or harm to California's rivers and wetlands.

Response AC-1: See Global Response 2 (Retail Population and Demand Projections).

1.6.30 Comment AD: Peter Drekmeier, Yosemite Rivers Alliance

Comment AD-1: The commenter states that Table 3-3 of the 2025 UWMP projects San Francisco's population to grow by 15,511 people per year compared to Figure 4-2, which shows the population growing by 3,102 people per year. The commenter asserts that it is unlikely San Francisco will add

five times as many people per year in the near future than it did in the recent past and requests that SFPUC revisit the population projections and replace them with more realistic numbers.

The commenter states that Table 3-4 shows BAWSCA member agencies' collective service area is projected to add 27,980 people per year, while Table 4 from the SFPUC's 2005 UWMP shows the BAWSCA member agencies' collective service area grew by 11,359 people per year. The commenter asserts that it is unlikely BAWSCA member agencies will add 2.4 times more people in the near future than in the recent past and requests that these numbers be revisited in the UWMP.

The commenter also asserts that Table 4-5 includes unrealistic demand growth for several BAWSCA member agencies, especially the City of Hayward, where 2025 purchases of 13.66 mgd are projected to rise to 19.71 mgd in 2050, an increase of 44% in the next 25 years. The commenter claims that BAWSCA's 2025 demand study overstates regional population and jobs growth by using Plan Bay Area numbers, does not account for the impact of droughts on reducing future demand, and assumes the price of water will keep pace with inflation despite SFPUC capital needs totaling \$10.1 billion.

Response AD-1: See Global Response 2 (Retail Population and Demand Projections) and Global Response 4 (Wholesale Demand Projections).

Comment AD-2: The commenter states that the UWMP projects Regional Water System demand will be 197.5 MGD in 2035, while SFPUC's Finance Bureau forecasts RWS sales will be 182.1 MGD in 2036, a difference of more than 15 MGD. The commenter cites an SFPUC report, "Water Enterprise and Finance Bureau Water Demand Projections" (July 5, 2022), which states that Water Enterprise projections represent an outside bound of whatever demand will occur in the next 25 years, while Finance projections are intended to be close to actuals for budgeting and rate setting. The commenter asks that the UWMP include alternative demand projections using Finance Bureau numbers and use these lower numbers to project rate increases and impact on demand.

Response AD-2: See Global Response 2 (Retail Population and Demand Projections), which references California Water Code Section 10631 requiring urban water suppliers to use projected population estimates based on data from state, regional, or local service agency population projections within the urban water supplier's service area.

The SFPUC has developed two additional demand scenarios as shown in Appendix C (2025 Retail Demand Model and Projections Technical Memorandum) of the 2025 UWMP. As discussed during the Public Hearing on April 14, 2026, the demand projections for the Department of Finance/Moody's Scenario are lower than SFPUC Finance's projections with water loss.

Comment AD-3: The commenter requests that Section 6.1.1 include a table that shows total Tuolumne River runoff and the Tuolumne River irrigation districts' water entitlements and San Francisco's water entitlements for each of the previous 50 years, as well as a second table showing how these numbers would have changed had the Bay-Delta Plan Amendment been in place during those years.

The commenter requests that Section 6.1.3 include information on how earlier runoff resulting from climate change might impact the SFPUC's water entitlements, including two new tables that show what would happen if the design-drought years were to repeat, but the runoff arrived 10 and 20 days earlier, and how this would impact the SFPUC's water entitlements.

The commenter requests that Section 6.1.3.1 add the following: the LTVA finding that runoff will shift to earlier in the season as a bullet point, Table 3-9 from the SFPUC's LTVA with the Design Drought, Table 5-1 from the LTVA, and a return period for the Design Drought.

Response AD-3: As shown in Section 8 of the 2025 UWMP, the Bay-Delta Plan Amendment of 2018 may affect each agency's access to reliable water supplies, the Bay-Delta Plan Amendment does not alter San Francisco's or the Tuolumne River irrigation districts' entitlements to water.

The LTVA does not find that a warmer climate "would likely benefit the SFPUC's water entitlements" due to earlier runoff. Instead, the LTVA finds that the annual average water available to San Francisco would decrease due to climate change (Section 5.1.1.2 and Figure 5-4(a) of the LTVA). Importantly, the LTVA finds that the *variability* in the water available to San Francisco increases with warming and estimated reductions in water availability can be much larger than any potential increases (Figure 5-6 of the LTVA). Understanding the changing variability in water available to San Francisco with warming is crucial in water supply planning to safeguard the SFPUC's water supply. It is not reasonable to assume that if the design drought scenario were perturbed by climate change, the only change would be runoff occurring 10 or 20 days earlier. The SFPUC has not evaluated the requested scenario.

On May 7, 2022, the SFPUC provided a memorandum to the Tuolumne River Trust (now Yosemite Rivers Alliance) describing issues with the Tuolumne River Trust's design-drought return period calculation. These issues were related to (1) an error in Upcountry hydrologic models, and 2) a large uncertainty in drought frequency analysis for extreme drought events. The SFPUC views assessment of the effects of climate change as an ongoing need that requires regular updating to reflect improvements in climate science, atmospheric/ocean modeling, observations, and human response to the threat of greenhouse gas emissions. Climate change research by the SFPUC began in 2009 and continues to be refined.

Comment AD-4: The commenter requests that Section 7.1 include lessons learned, noting that when WSIP was adopted in 2008, projected 2018 demand was 285 mgd, the Phased WSIP capped water sales at 265 mgd, and actual demand in 2018 was 196 mgd.

The commenter requests that Section 7.4 explain how Alternative Water Supply Plan "Demands" and "Obligations" were determined. The commenter recommends adding a second "Demands" column based on Finance Bureau sales projections.

Response AD-4: As recommended in the 2024 Alternative Water Supply Plan, the SFPUC developed additional retail demand scenarios that are reflected in the 2025 UWMP (see Appendix C). These scenarios show a range of future demands and will be used to inform the upcoming Alternative Water

Supply Plan Update, which is expected to begin in FY 2026-27. For wholesale demand projections, please see Global Response 3.

Comment AD-5: The commenter requests that the SFPUC justify the design drought with analyses and documentation or revise it based on new information, including the LTVA.

The commenter also requests that Table 8-3 start with Year 1 of the Design Drought (not Year 2) and include a row showing the amount of water remaining in storage at the end of each year.

Response AD-5: Comment noted. See Global Response 4 (Design Drought).

1.6.31 [Comment AE: John J. Bauters, Sierra Club San Francisco Bay Chapter; Sue Chow, Sierra Club Loma Prieta Chapter; Miguel Miguel, Sierra Club California](#)

Comment AE-1: The commenters state that they have concerns that the draft 2025 UWMP demand projections present an unrealistically high future water demand. The commenters argue inflated demand projections are being used to justify expensive capital projects and large budgets, and that the SFPUC's proposal to raise its wholesale water rates for the next two years will affect customers in San Francisco in the same way it will affect wholesale customers. In addition, the commenters assert that the SFPUC is using these same demand projections to inform its response to the Bay-Delta Plan Amendment.

The commenters are also concerned that the SFPUC's 8.5-year design drought is 2.5 years longer than the six-year design drought used by peer agencies. The commenters argue this posture does not appear in line with guidance from the California Department of Water Resources to provide a realistic prediction of future water use based upon a supplier's past and current water use, combined with considerations of anticipated growth, new regulations, changing climate conditions, and trends in customer water use behaviors.

Response AE-1: Comments noted. See Global Response 2 (Retail Population and Demand Projections) and Global Response 4 (Design Drought).

Comment AE-2: The commenters state that the SFPUC takes BAWSCA's projections and incorporates them into its own projections, even though BAWSCA member agencies represent two-thirds of Regional Water System demand. The commenters note that from their conversation with the consulting team building the BAWSCA model, it appears that they are assuming in their model that many of the coefficients they derive from past correlations carry on into the future unchanged and that they also appear to be incorrectly interpreting what happens to water use in a hotter, drier future climate.

Response AE-2: Comment noted. See Global Response 3 (Wholesale Demand Projections).

Comment AE-3: The commenters assert that a Drought-Demand Model is a better predictor of water demand, every drought has resulted in large demand reductions, and post-drought demand has not rebounded to previous levels. They state that the Sierra Club has built a Drought-Demand Model that

uses a common drought measure to predict future water use. The commenters state that this model uses the California Department of Finance population projections for San Francisco and San Mateo County, which project 0.08% and 0.12% annual population growth to 2050, respectively. They state that the Sierra Club's modeling and assumptions suggest a decline in water demand of about 45 MGD over the next 25 years. Commenters argue the Sierra Club's modeling and assumptions indicate the retail and wholesale projections are overestimating demand by about 50% over the next 25 years. They assert that the model shows that 2050 retail and wholesale demand will be about 147 MGD. The commenters also assert that BAWSCA and the SFPUC use relatively high population growth projections based on the projections of planning departments or the Association of Bay Area Governments, while the Department of Finance projections have been accurate within 3% on a 10-year basis.

Response AE-3: Comment noted. See Global Responses 3 (Wholesale Demand Projections) and 4 (Design Drought).

Comment AE-4: The commenters assert that over-estimation of demand negatively impacts riverine ecosystems. The commenters claim that the Bay-Delta Plan Amendment assures enough water for continued recovery of salmon and other species and for improved health of the ecosystem. The commenters argue that unproven claims of demand hardening and over-projections are driving identification of new supplies under the Alternative Water Supply Plan. The commenters urge the SFPUC to reconsider its demand projections.

Response AE-4: See Global Response 2 (Retail Population and Demand Projections).

Comment AE-5: The commenters assert that high demand projections encourage capital spending and lead to misleadingly low rate projections, where if demands do not materialize as forecasted, the SFPUC must increase rates above what was projected. The commenters also assert that higher water rates cause further reductions in demand, which has contributed to the decline in per capita demand in the past 20 years. Based on the SFPUC's own projections, the commenters suggest combined water and sewer rates will become unaffordable for typical San Francisco households in a decade and recommend utilizing more realistic demand projections to improve planning, reduce rate increases, reduce alternative water supplies, and help address affordability.

Response AE-5: See Global Response 1 (Water Affordability).

Comment AE-6: The commenters recommend three actions:(1) create a working group with SFPUC staff and interested parties to build revised demand scenarios; (2) reassess how supply and demand are conceived of in light of affordability and ecological concerns; and (3) work with interested parties in 2026 to re-examine the SFPUC's approach to the Bay-Delta Plan Amendment in light of changed demand projections.

Response AE-6: Comments noted.